

MARY L. D'AGOSTINO (315) 565-4550 mdagostino@hancocklaw.com

May 19, 2025

## **VIA ELECTRONIC FILING**

Hon. Brenda K. Sannes, Chief District Judge James M. Hanley Federal Building 100 S Clinton St. Syracuse, New York 13261

Maddox v. Francemone, 5:19-cv-0678-BKS-MJK

Dear Chief Judge Sannes,

Our office represents Police Officer Kelsey Francemone in connection with the abovereferenced matter. We write to provide the Court an update regarding the witness that remain for Defendant's case. We anticipate that the case will proceed as follows:

Tuesday	Wednesday	Thursday
Khalil Davis	Sarah Pierce	Michael Primeau
Carlos Stackhouse	Timothy MacDerment	
Joseph Coolican	Dr. Daniel Reisberg	
Evelyn Tennyson	George Hack	
Jacob Breen	Ed Flosi	
Fred Lamberton		
Jeremy Merola		
Thomas Skardinski		

Despite the number of witnesses Defendant intends to present tomorrow, we anticipate it is likely we will conclude with witness testimony before 5:00 p.m. This timing is partially influenced by the undersigned's scheduling conflict tomorrow, which prevents the calling of two of Wednesday's witnesses a day early.

Respectfully submitted,

HANCOCK ESTABROOK, LLP

MLD/

CC: all counsel of record (via electronic filing)